EXHIBIT J

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2   IN THE UNITED STATES DISTRICT COURT

3   SOUTHERN DISTRICT OF OHIO

4   EASTERN DIVISION

5   *   *   *

6   EDISON BREWING COMPANY, LLC,

7   Plaintiff,

8   VS   Case No.

                              2:21-cv-00876-EAS-CMV

9   GOURMET FRESH, LLC,

10   Defendant.

11   *   *   *

12   Deposition of LISA SULLIVAN,

13   Witness herein, called by the Plaintiff for

14

15   cross-examination pursuant to the Rules of

16

17   Civil Procedure, taken before me, Donald

18

19   Correll, a Notary Public in and for the State

20

21   of Ohio, at Standley Law Group, LLP, on

22

23   Tuesday, the 2nd day of December 2021, at

24

25   9:27 a.m.

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1   contracted for outside wedding planning

2   services.

3   Q.   Does Izaya essentially function as

4   a wedding planner?

5   A.   She handles all of the planning

6   related to the venue and all of our services.

7   She wouldn't, for example, assist with an

8   off-site ceremony or helping them with a

9   photographer contract, for example. But

10 everything related to what we provide, yes.

11   Q.   You said that all-inclusive is

12 used differently in the industry than you use

13 it?

14   A.   Yes.

15   Q.   So starting with what you

16 understand about the industry, what is the

17 industry definition of all-inclusive?

18   A.   Industry standard is generally use

19 of the space. The food and beverage is

20 typically done in-house. Any of your basic

21 needs to execute an event are included, such as

22 tables, chairs. Usually it's black or white

23 linens. Silverware. That type of thing. All

24 the minimals you need to execute an event. We

25 do all of that, plus several other things.

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1   Q.   And that is your definition of

2   Gourmet Fresh, Edison777 all-inclusive? That

3   plus the other things?

4   A.   Yes.

5   Q.   So what are the other things?

6   A.   We handle all of the DJ services

7   for your on-site ceremony and reception. We

8   handle all of the floral needs. So if you need

9   center pieces, bouquets, boutonnieres. We do

10   the wedding cake, as well. We offer 80

11   different linen colors and napkin colors, as

12   opposed to black or white. We have additional

13   things that you can rent through us, such as

14   chargers and votives and other decor

15   enhancements. We have a photo booth. We offer

16   valet. I'm sure there's others. Those are the

17   big points.

18   Q.   So the DJ services. Those are

19   provided by -- is it D&M DJ Services?

20   A.   Yes.

21   Q.   And they are not in the Gourmet

22   Fresh, LLC, correct?

23   A.   Correct.

24   Q.   So they're kind of a preferred

25   vendor?

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 1   within my first few weeks, I basically spent

 2   that time creating and finalizing our wedding

 3   packages, our pricing, all of that.  So on

 4   December 8th, when that was finalized, I sent

 5   it out to everyone who would initially inquire

 6   prior to that and basically said I don't have

 7   all my final information yet.  Stay tuned.

 8   I'll send it to you when I get it.  And so

 9   sometime on or about December 8th would have

10   been when these clients in particular received

11   that wedding packet from me.

12          Q.   Would you recall if it had been a

13   referral?

14          A.   It wasn't.

15          Q.   Did they do any type of tour

16   before booking?

17          A.   Sort of.

18          Q.   What kind of tour did they do

19   before booking?

20          A.   Prior to the venue, prior to the

21   building being up and running, I was meeting

22   with prospective clients at The FIG Room.

23   Which is less than half a mile away.  So they

24   would have met with me at The FIG Room.  I had

25   renderings, other information for them to kind
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 1   of meet with me in person and chat through the

 2   day with them.

 3          Q.    These renderings, how were they

 4   presented?

 5          A.    Big foam core.  I had poster

 6   boards.  I think I had six of them at the time.

 7          Q.    So like two-dimensional printouts?

 8          A.    Two-dimensional printouts, yes.

 9          Q.    And what was depicted on those

10   print outs?

11          A.    I believe there were two different

12   views of the street exterior of the building.

13   There was a courtyard rendering.  There were

14   two interior renderings, and then there were

15   one or two floor plan, sample floor plan,

16   mockups.  So there were, yeah, six or seven

17   posters.

18          Q.    So the exterior views were the

19   front facade in the courtyard?

20          A.    The exterior views were the front

21   facade and then another angle of the front, and

22   then the courtyard was a third.

23          Q.    And then the interior views, what

24   did those depict?

25          A.    There was a view as if you were
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1   Q.   And those are done every six

2   months?

3   A.   Roughly.

4   Q.   So the next one would be early

5   June?

6   A.   Well, no. Our next one is in

7   January, because we changed the schedule. It

8   will be January, and then July is our next one

9   after that.

10   Q.   How many couples attended last

11   night?

12   A.   29 weddings.

13   Q.   And how many have you got

14   scheduled for January so far?

15   A.   I think it's bigger than that. So

16   I think it's somewhere in the mid 30s.

17   Q.   Does anyone other than the couples

18   attend those?

19   A.   Yes.

20   Q.   Is it typically parents?

21   A.   They're welcome to bring two

22   complimentary guests to the first look events.

23   It's generally parents, and then they can pay

24   for two additional guests to attend.

25   Q.   Can you run me through what a

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1   first event looks like?

2   A.   Yeah.   It's the client's

3   opportunity to see the space fully decorated,

4   try our most popular entrees, try the most

5   popular cake flavors and fillings, see a

6   variety of linen samples, see a ton of floral

7   ideas, different inspiration there.

8   It's just a fun night out for them

9   to experience the venue similarly to how it

10 might be on their wedding day. The DJ is there

11 playing music. The bar is open. The photo

12 booth is running. It's just kind of a nice

13 night out for them to get ideas and try things.

14   Q.   Besides private tours and the

15 first look hosted last night, have there been

16 any other events at 777 North 4th Street

17 showcasing the venue, introducing it to

18 clients?

19   A.   Yes.   In sometime over the summer

20 we hosted a vendor open house. That was by

21 invite only, but we invited various wedding

22 vendors in the city to see the space.

23   We also held a client open house

24 for our already-booked clients who had booked

25 with me, again, prior to the venue being open.

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1   IN WITNESS WHEREOF, I have hereunto set

2   my hand and seal of office at Dayton, Ohio, on

3   this 12th day of December 2021.

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12   *Donald E. Correll*
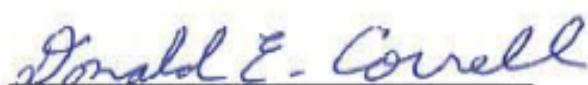
                DONALD CORRELL

13   NOTARY PUBLIC, STATE OF OHIO

                My commission expires 8-9-2022

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 1                    DEPOSITION REVIEW
                    CERTIFICATION OF WITNESS
 2

          ASSIGNMENT REFERENCE NO: 4962968
 3        CASE NAME: Edison Brewing Company, LLC v. Gourmet Fresh, Llc
          DATE OF DEPOSITION: 12/2/2021
 4        WITNESS' NAME: Lisa Sullivan
 5        In accordance with the Rules of Civil
     Procedure, I have read the entire transcript of
 6   my testimony or it has been read to me.
 7        I have made no changes to the testimony
     as transcribed by the court reporter.
 8

      _02/04/2022_____        _____
 9   Date                       Lisa Sullivan
10        Sworn to and subscribed before me, a
     Notary Public in and for the State and County,
11   the referenced witness did personally appear
     and acknowledge that:
12

          They have read the transcript;
13        They signed the foregoing Sworn
               Statement; and
14        Their execution of this Statement is of
               their free act and deed.
15

          I have affixed my name and official seal
16
     this _____ day of_____, 20____.
17

               _____
18             Notary Public
19             _____
               Commission Expiration Date
20
21
22
23
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25
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